

**UNITED STATES DISTRICT COURT**  
for the  
Eastern District of Michigan

United States of America

v.

Demarco Tillis

Case No. Case: 2:20-mj-30536  
Judge: Unassigned,  
Filed: 12-30-2020 At 11:26 AM  
USA v. DEMARCO TILLIS (cmp)(mlw)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 22, 2020 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*  
18 USC § 922(g)(1)

*Offense Description*  
Felon in possession of a firearm


This criminal complaint is based on these facts:  
see attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: December 30, 2020

City and state: Detroit, Michigan

  
Complainant's signature  
Det. Jeb Rutledge, Task Force Officer (ATF)  
Printed name and title

  
Judge's signature

Hon. Patricia T. Morris, United States Magistrate Judge  
Printed name and title

**AFFIDAVIT IN SUPPORT OF  
CRIMINAL COMPLAINT**

I, Task Force Officer and Detective, Jeb Rutledge being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a duly sworn Police Officer currently holding the rank of Detective with the City of Detroit, MI. I have been with the Detroit Police Department since 1998 and was appointed to Detective in 2014. In my 22 years as a Detroit Police Officer, I have worked numerous assignments including, Uniformed Patrol, plain clothes, Precinct Special Operations, Breaking and Entering Task Force, Precinct Detective Unit and Homicide. During my career, I have been involved in or have been the Officer in Charge of hundreds of investigations that range from larcenies to violent assaults and homicides that have resulted in successful state prosecutions. I transferred to the Bureau of Alcohol, Tobacco, Firearms, and Explosives, Firearms Investigative Team (ATF/FIT) in August 2020 and sworn in as a Task Force Officer in November 2020.

2. I make this affidavit based on my training and experience from information gathered in this investigation from involved Officers, Special Agents or others who have personal knowledge or participated in

this investigation. The facts and circumstances surrounding the investigation and subsequent arrest of Demarco TILLIS are comprised of the following:

- A. 911 / Computer Aided Dispatch (CAD) calls of service records relating to the Scout 8-81 response to White Castle restaurant at 20409 James Couzens Freeway on November 22, 2020 at approximately 1:29 a.m.
- B. Police reports related to the investigation, arrest and evidence regarding Demarco TILLIS.
- C. Body cameras worn by Officers Hampton and Teamer that capture the events in their entirety.
- D. Dash camera footage that captures the incident in its entirety.
- E. Criminal History records of Demarco TILLIS indicating he has not met the requirements to legally possess a firearm based on his previous felony convictions.

3. This affidavit is for the limited purpose of establishing probable cause that Demarco TILLIS (DOB xx/xx/1997) has violated Title 18, United States Code, Section 922(g)(1), Felon in Possession of a Firearm, and does not contain all details or facts known to law enforcement related to this investigation.

## **PROBABLE CAUSE**

4. On November 22, 2020, at approximately 1:30 a.m., Detroit Police Officers Hampton and Teamer were dispatched via 911 to the White Castle restaurant located at 20409 James Couzens Freeway, Detroit, MI. Dispatch provided information that, a blue pickup was blocking the drive thru lane. When the officers arrived, they did not observe a blue pickup, but were alerted to a red 2005 Chrysler Minivan with a honking horn, stationary in the drive thru lane. Officers walked up to the vehicle and observed the lone occupant, later identified as Demarco TILLIS, asleep behind the wheel. The officers approached the minivan and illuminated the interior of the Town and Country with flashlights. Officer Teamer observed a handgun on the front passenger seat of the van and alerted Cpl. Hampton. Cpl. Hampton was able to awaken TILLIS by knocking on the window of the van. Once awoken, TILLIS was ordered out of the vehicle, at which time TILLIS was detained and the weapon secured.

5. Officers requested identification and paperwork from TILLIS and inquired if TILLIS had a valid Certified Pistol License. TILLIS responded “no, my girlfriend does”, TILLIS was arrested.

6. The weapon recovered was a 9mm Smith & Wesson, M&P 2.0 semi-automatic handgun, serial #JDY2889 loaded with eight (8) 9mm rounds in the magazine.

7. The 2005 Red Chrysler Town and Country Minivan bearing MI license plate EGKxxx was impounded incident to arrest.

8. On December 17, 2020, a computerized criminal history check showed that TILLIS has the following felony convictions:


- A. 2008 – Felony - Attempt – weapons, carrying concealed – TILLIS pleaded guilty.
- B. 2015 – Felony assault with intent to do great bodily harm less than murder or by strangulation – TILLIS pleaded guilty.

9. On December 18, 2020, Special Agent Michael Jacobs advised Affiant, based upon the verbal descriptions provided, without physically examining the firearm, that the referenced firearm is a firearm as defined under 18 U.S.C. § 921, and was manufactured outside of the state of Michigan after 1989, and therefore had traveled in and affected interstate commerce.

## CONCLUSION

10. Probable cause exists that Demarco TILLIS, knowing that he had been previously convicted of a felony offense, did knowingly possess a firearm and ammunition, that had previously traveled in interstate and/or foreign commerce, in violation of 18 U.S.C. § 922(g)(1).

Respectfully submitted,

  
Det. Jeb Rutledge, Task Force Officer  
Bureau of Alcohol, Tobacco, Firearms  
and Explosives

Sworn to before me and signed in my  
presence and/or by reliable electronic means.

  
HON. PATRICIA T. MORRIS  
UNITED STATES MAGISTRATE JUDGE

Date: December 30, 2020